

Exhibit 1-36

Conditionally Filed Under Partial Seal

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

Alice Svenson, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

Google Inc. and Google Payment
Corporation,

Defendants.

Case No. 5:13-cv-04080-BLF

CLASS ACTION

DEFENDANT GOOGLE INC.'S AMENDED
SUPPLEMENTAL ANSWERS TO
PLAINTIFF'S INTERROGATORIES,
SET ONE

CONTAINS INFORMATION DESIGNATED
"CONFIDENTIAL" PURSUANT TO THE
PARTIES' PROTECTIVE ORDER ENTERED
AUGUST 6, 2014

PROPOUNDING PARTY: PLAINTIFF ALICE SVENSON

RESPONDING PARTY: DEFENDANT GOOGLE INC.

SET NO: ONE

1 Policy, Wallet Buyer Terms of Service, and Google Wallet Privacy Notice and register for
2 Google Wallet.

3
4 **INTERROGATORY NO. 12:**

5 Identify and describe, in detail, what information relating to named Plaintiff Alice
6 Svenson, including but not limited to SID, is or was PROVIDED to VENDOR YCDroid
7 specifically and to any other third party, including what information is or was PROVIDED as
8 “Shipping Information” associated with her App purchase as set forth in the Complaint and when
9 and by and to whom.

10 **ANSWER:**

11 Google incorporates its general objections, in particular its objections to Plaintiff’s
12 definitions of the terms “SID,” “PROVIDED,” and “VENDOR.” Google also objects to this
13 Interrogatory to the extent it seeks information outside that at issue in this case. Subject to and
14 without waiving these objections, Google incorporates its answer and objections to Interrogatory
15 No. 1, and will produce pursuant to Rule 33(d) records of Plaintiff’s Google Wallet account and
16 the Google Wallet Merchant Center that are sufficient to answer this Interrogatory.

17
18 **INTERROGATORY NO. 13:**

19 Identify the total number of BUYERS whose SID, and data styled as SHIPPING
20 INFORMATION, respectively, was PROVIDED to VENDORS pursuant to a BUYER App
21 purchase, and to YCDroid in connection with BUYER purchases of the YCDroid “SMS MMS to
22 Email” App, respectively, during the Relevant Time Period, with breakdowns by month, year,
23 and location, including state and state and local tax jurisdiction.

24 **ANSWER:**

25 Google incorporates its general objections, in particular its objections to Plaintiff’s
26 definitions of “SID,” “PROVIDED,” and “VENDOR.” Google also objects to this Interrogatory
27 to the extent it seeks information outside that at issue in this case. Moreover, this Interrogatory
28

1 seeks information that is beyond the scope of the issues that the parties and court must address in
 2 connection with class certification. In connection with class certification, Google will not contest
 3 that the number of United States buyers who purchased Apps on Google Play using Google
 4 Wallet is sufficient for purposes of Rule 23(a)(1) numerosity. Accordingly, this Interrogatory
 5 seeks information that is invasive, confidential, and potentially reasonably calculated to lead to
 6 the discovery of admissible evidence only with regard to merits issues, and Google objects to
 7 producing such information at this stage in the case on these grounds. Google also objects to this
 8 Interrogatory as compound. Google will supplement this Interrogatory response if and when a
 9 class is certified.

10
 11 **INTERROGATORY NO. 14:**

12 Identify the top ten VENDORS to whom you PROVIDED SID, and data styled as
 13 SHIPPING INFORMATION, respectively, for the greatest number of BUYERS during the
 14 Relevant Time Period, with breakdowns by VENDOR, VENDOR location (including each
 15 VENDOR's country, state or province, and all other address information you have), month, and
 16 year, as well as the total number of BUYERS whose SID and "SHIPPING INFORMATION,"
 17 respectively, that you PROVIDED to VENDOR YCDroid.

18 **ANSWER:**

19 Google incorporates its general objections, in particular its objections to Plaintiff's
 20 definitions of "SID," "PROVIDED," and "VENDOR." Google also objects to this Interrogatory
 21 to the extent it seeks information outside that at issue in this case. Moreover, this Interrogatory
 22 seeks information that is beyond the scope of the issues that the parties and court must address in
 23 connection with class certification. In connection with class certification, Google will not contest
 24 that the number of United States buyers who purchased Apps on Google Play using Google
 25 Wallet is sufficient for purposes of Rule 23(a)(1) numerosity. Accordingly, this Interrogatory
 26 seeks information that is invasive, confidential, and potentially reasonably calculated to lead to
 27 the discovery of admissible evidence only with regard to merits issues, and Google objects to
 28

1 The following sentence is designated *CONFIDENTIAL* pursuant to the parties' Protective
2 Order: [REDACTED]

3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]

7
8 **INTERROGATORY NO. 16:**

9 Identify and describe, in detail, the process by which you receive or keep a portion or
10 amount of each App's purchase price; the process by which you collect said portion or amount
11 and from whom you collect it; and the process by which you remit the remainder of the App
12 purchase price to the VENDOR.

13 **ANSWER:**

14 Google incorporates its general objections, in particular its objections to Plaintiff's
15 definition of the term "Identify." Notwithstanding and without waiving these objections, Google
16 incorporates by reference GPC's response to Plaintiff's Interrogatories, Set One, Interrogatory
17 No. 16.

18
19 Dated: October 27, 2014

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